

STATE OF SOUTH CAROLINA	)	BEFORE THE
	)	PUBLIC SERVICE COMMISSION
	)	DOCKET NO. 2016-222-WS
<b>In re:</b>	)	
<b>Application of Kiawah Island Utility,</b>	)	
<b>Incorporated for Approval of</b>	)	<b>Petition to Intervene and Protest</b>
<b>Proposed Changes in Water and</b>	)	
<b>Sewer Rates, Charges, Classifications</b>	)	
<b>and/or Regulations (Letter of Intent)</b>	)	

Petitioner Kiawah Island Community Association, Inc. ("Petitioner KICA") would show this Commission the following:

1. This is a Petition to Intervene submitted pursuant to S.C. Code Regs. 103-825(3) and a Protest submitted pursuant to S.C. Code Regs. 103-827.
2. Petitioner KICA is a not-for-profit corporation formed under the laws of the State of South Carolina located at 23 Beachwalker Drive, Kiawah Island, SC 29455.
3. Petitioner KICA's mission is to preserve and enhance the quality of life and property values of its members, who are property owners on Kiawah Island.
4. Kiawah Island Utility, Inc. ("Applicant"), which provides water and sewer services, has filed the instant Application requesting that the Commission approve monthly water and sewer charges as set forth in the rate schedules attached as Exhibit A to its Application.
5. Petitioner KICA is directly affected by this proposed rate increase in that the Petitioner KICA is a significant user of the applicant's services. Additionally, Petitioner KICA's members are customers of the Applicant who will be directly impacted by the requested rate increases.
6. Petitioner KICA believes that the requested rate increases may be excessive and unreasonable under the circumstances.
7. The amount of the increase is significantly greater than the increase Applicant initially indicated it would be seeking.

8. Petitioner KICA wishes to further examine this issue to determine whether it will present testimony or otherwise oppose the Application.

9. Because Petitioner KICA does not have sufficient information on the above-captioned Application for adjustment of rates, it protests the rate adjustment at this time.

10. Petitioner KICA further requests that this Commission grant it leave to intervene and participate in all proceedings on this docket, including notice of all further matters involving this proceeding.

11. Petitioner KICA is currently further determining its views about the Kiawah Island Utility, Inc. request and cannot now indicate the amount of time expected for any presentation at the hearing in this matter. Petitioner KICA reserves the right to formal questioning of witnesses during the proceeding.

12. Petitioner KICA further requests that this Commission hold all hearings involving this proceeding in the service area of the Kiawah Island Utility Company, with Petitioner KICA's preference being the Kiawah Island Municipal Center, 21 Beachwalker Drive, Kiawah Island, SC 29455.

13. M. Dawes Cooke, Jr. and John W. Fletcher will serve as KICA's attorney in this docket. Petitioner KICA respectfully requests that Messrs. Cooke and Fletcher be added to all service lists. Their address is:

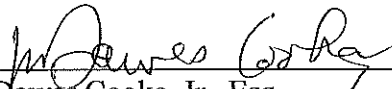
M. Dawes Cooke, Jr., Esq.  
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John W. Fletcher  
jfletcher@barnwell-whaley.com  
BARNWELL, WHALEY, PATTERSON, AND HELMS, LLC  
P.O. Drawer H (29402)  
288 Meeting Street, Suite 200  
Charleston, SC 29401  
(843) 577-7700

14. Additionally, Petitioner KICA respectfully requests that notice be provided to its Chief Operating Officer, Jimmy Bailey at the following address:

Kiawah Island Community Association, Inc.  
23 Beachwalker Drive  
Kiawah Island, SC 29455  
(843) 768-9194  
Fax: (843) 243-8789  
jimmy.bailey@kica.us

WHEREFORE, Petitioner Kiawah Island Community Association, Inc. respectfully requests the above-mentioned relief and any other and further relief that this Commission may deem just and proper.

BARNWELL, WHALEY, PATTERSON, AND  
HELMS, LLC

By:   
M. Dawes Cooke, Jr., Esq.

John W. Fletcher  
P.O. Drawer H (29402)  
288 Meeting Street, Suite 200  
Charleston, SC 29401  
(843) 577-7700

***Attorneys and Authorized Representatives for  
Petitioner Kiawah Island Community  
Association, Inc.***

Jimmy Bailey  
Chief Operating Officer  
Kiawah Island Community Association, Inc.  
23 Beachwalker Drive  
Kiawah Island, SC 29455  
(843) 768-9194  
Fax: (843) 243-8789 (F)

***Authorized Representative for Petitioner  
Kiawah Island Community Association, Inc.***

Dated: December 22, 2016  
Charleston, South Carolina

STATE OF SOUTH CAROLINA

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**Certificate of Service**

I hereby certify that the following persons have been served via US mail, postage prepaid  
with a copy of the Petition to Intervene and Protest in the above-captioned matter:

Charles L.A. Terreni, Counsel  
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Fax: 803-771-8778  
***Representing Applicant Kiawah Island Utility, Inc.***

Florence P. Belser, Counsel  
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***Representing Office of the Regulatory Staff***

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Fax: 803-771-8010

***Representing Applicant Kiawah Island Utility, Inc.***

Shannon Bowyer Hudson, Counsel

Office of Regulatory Staff

1401 Main Street, Suite 900

Columbia, SC 29201

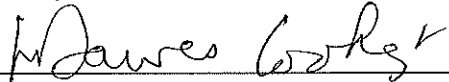
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***Representing Office of the Regulatory Staff***

BARNWELL, WHALEY, PATTERSON, AND  
HELMS, LLC

By: 

M. Dawes Cooke, Jr., Esq.

John W. Fletcher

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288 Meeting Street, Suite 200

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***Attorneys and Authorized Representatives for  
Petitioner Kiawah Island Community  
Association, Inc.***

Jimmy Bailey

Chief Operating Officer

Kiawah Island Community Association, Inc.

23 Beachwalker Drive

Kiawah Island, SC 29455

(843) 768-9194

Fax: (843) 243-8789

***Authorized Representative for Petitioner  
Kiawah Island Community Association, Inc.***

Dated: December 22, 2016  
Charleston, South Carolina